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8  
9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE DISTRICT OF NEVADA**

11 Joseph O'Shaughnessy, *et al.*,  
12 Plaintiffs,  
13  
14 v.  
15 United States of America, *et al.*,  
16 Defendants.

No. 2:20-cv-00268-RFB-EJY

**UNOPPOSED MOTION TO EXTEND  
TIME TO FILE REPLY TO MOTION  
TO DISMISS  
(FIRST REQUESTED EXTENSION)**

17  
18 All Defendants, United States of America, Nadia Ahmed, Steven Myhre, Daniel  
19 Bogden, Mark Brunk, Rand Stover, Joel Willis, and Daniel Love, hereby move, pursuant  
20 to Federal Rule of Civil Procedure 6(b)(1) and Local Rule LR IA 6-1, for a 21-day  
21 extension of time to December 24, 2020, to file their Replies to Defendants' Motion to  
22 Dismiss (Doc. 44) and Joinder in Motion to Dismiss (Doc. 46).

23 This is Defendants' first requested extension of time to file their Replies.

24 Plaintiffs' Response to the Motion to Dismiss consisted of 34 pages and 117 case  
25 citations. The Replies in this matter require review and comment by counsel for multiple  
26 federal agencies, as well as, individual Defendants before filing. Review of the Response  
27 and cases cited is being pursued with diligence but the quantity and complexity of the issues  
28 involved, along with the number of people, requires additional time particularly in light of

1 the difficulties of communication caused by the intervening Thanksgiving holiday.

2 Undersigned counsel Heathcotte and Pomerantz affirm that Plaintiff's counsel  
3 Marquiz consents to the granting of this motion.

4 For the foregoing reasons, Defendants respectfully request that the deadline to file  
5 an Answer to the First Amended Complaint be extended to December 24, 2020.

6 RESPECTFULLY SUBMITTED this 27th day of November, 2020.

7  
8 WILLIAM P. BARR  
United States Attorney General

9  
10 s/ Brock Heathcotte  
BROCK HEATHCOTTE  
11 Special Assistant United States Attorney, Acting  
Under Authority Conferred by 28 U.S.C. § 515

12 *Attorneys for Defendants United States, Ahmed,*  
13 *Myhre, Bogden, Brunk, Stover, and Willis*

14  
15 SKLAR WILLIAMS PLLC

16 /s/ Crane Pomerantz  
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21 *Attorneys for the Defendant Love*

22  
23 IT IS SO ORDERED:

24  
25 UNITED STATES MAGISTRATE  
26 JUDGE

27 DATED: \_\_\_\_\_  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on November 27, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants.

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s/ James Gilmore  
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